

REMARKS

This response is submitted along with a request for a three month extension and appropriate fee in reply to the final Office Action dated February 19, 2008. Applicants have also submitted herewith a Notice of Appeal, which is provided at this point in order to extend the pendency of the present application to give the Examiner time to consider the arguments presented herein.

In light of the remarks presented below, Applicants respectfully request reconsideration and allowance of all now-pending claims of the present application.

Reconsideration and allowance of this application is respectfully requested. Claims 1-36 are now pending in the present application. Claim 36 is allowed. Claim 11 is objected to. Claims 1-10 and 12-35 are rejected. Applicants submit that this application is in condition for allowance and such action is earnestly requested. Each of the Examiner's reasons for rejection is addressed below for the claims that are still pending.

Applicants' representative and the Examiner had a telephonic interview on April 15, 2008. Arguments were presented that Kahn did not disclose an image wise thermal pattern in response to an image wise pattern of light. The Examiner indicated that these arguments were not immediately persuasive.

Rejections

35 U.S.C. § 103

Claims 1, 7-10, 12 and 14-15

Claims 1, 7-10, 12 and 14-15 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over US Patent No.5,080,467 to Kahn et al. ("Kahn") in view of U.S. Patent No. 7,138,973 to Okafuji et al. ("Okafuji"). Applicants respectfully submit that these claims are patentable over Kahn in view of Okafuji.

Kahn fails to teach or suggest "exposing the liquid crystal display to the image wise pattern of light" as recited in claim 1. The Examiner indicated at Page 4 that this is "clear from fig. 2." Applicant respectfully submits that Figure 2 of Kahn does not show the liquid crystal display being exposed to an image wise pattern of light. Figure 2 of Kahn shows exposing the

liquid crystal display to a spatially uniform optical beam from lamp 42. In the corresponding description of Figure 2, Kahn discloses that “[T]he optical energy is generated by a lamp 42” (col. 5, lines 29-30) and “[T]his flash tube 42 is used because it provides an intense, short, *spatially uniform optical beam*” (col. 6, lines 8-10, emphasis added) or pulse that is absorbed by the liquid crystal 32 such that when the liquid crystal cools subsequent to the pulse, uniform texture of scattering centers are formed (col. 5, lines 32-39). This preconditioning of the medium enhances the display by providing a dark uniform background. Indeed, Kahn discloses that “[T]his invention relates to improved methods and apparatus for creating *uniform* image backgrounds” (col. 1, lines 59-60, emphasis added). This process is independent of imaging and does not involve exposing the liquid crystal display to an “image wise *pattern* of light.” Thus, Kahn fails to teach or suggest “exposing the liquid crystal display to the image wise pattern of light.”

The Examiner at Page 2 has oversimplified Applicants’ argument as being simply that “Kahn does not disclose an image wise pattern of light.” The Examiner indicated at Page 2 that column 6, lines 18-19 of Kahn state that “this enables faster writing of bright *patterns* on dark backgrounds” (emphasis added) and that Kahn therefore discloses this limitation. Applicants respectfully disagree. *Writing* a pattern on a dark background is not the same as “*exposing* the liquid crystal display to an *image wise pattern of light*” as recited in claim 1 and indeed, Kahn is silent as to how such patterns are written.

Kahn fails to teach or suggest “a light absorbing layer for forming an image wise thermal pattern in response to an image wise pattern of light,” as recited in claim 1. The Examiner did not fully address this argument, and instead only asserted that this limitation is satisfied by “a light absorbing layer (35 and 37 in fig. 2; col. 6, lines 39-44) for forming an image wise thermal pattern (col. 5, lines 33-38) in response to an image wise pattern of light (42 in fig. 2; col. 5, lines 29-32).” As noted above, Kahn discloses that “[T]his invention relates to improved methods and apparatus for creating *uniform* image backgrounds” (col. 1, lines 59-60, emphasis added) and does not teach or suggest “forming an image wise thermal pattern in response to an image wise pattern of light.” Creating a *uniform* background in response to a *uniform* optical pulse as shown in Figure 2 is not the same as the “forming an image wise thermal *pattern* in response to an image wise *pattern* of light” as recited in the present claims. Thus, Kahn fails to teach or

suggest “a light absorbing layer for forming an image wise thermal pattern in response to an image wise pattern of light,” as recited in claim 1.

Okafuji fails to teach or suggest “exposing the liquid crystal display to the image wise pattern of light.” Okafuji further fails to teach or suggest “a light absorbing layer for forming an image wise thermal pattern in response to an image wise pattern of light.”

Thus, Applicants respectfully submit that claim 1 is patentable over Kahn in view of Okafuji. Claims 7-10, 12 and 14-15 are patentable over Kahn in view of Okafuji, at least by their dependency on claim 1 for the same reasons as outlined above.

Claims 1, 5-8, 12-13, 16, 26, 28-29

Claims 1, 5-8, 12-13, 16, 26, 28-29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kahn in view of U.S. Patent No. 6,154,190 to Yang et al. (“Yang”). Applicants respectfully submit that these claims are patentable over Kahn in view of Yang.

Claims 1, 5-8, 12-13, 16

As discussed above, Kahn fails to teach or suggest “exposing the liquid crystal display to the image wise pattern of light” as recited in claim 1. Further as discussed above, Kahn fails to teach or suggest “a light absorbing layer for forming an image wise thermal pattern in response to an image wise pattern of light.”

Yang fails to cure the deficiencies of Kahn with respect to claim 1. Yang fails to teach or suggest “exposing the liquid crystal display to the image wise pattern of light.” Yang further fails to teach or suggest “a light absorbing layer for forming an image wise thermal pattern in response to an image wise pattern of light.”

Thus, Applicants respectfully submit that claim 1 is patentable over Kahn in view of Yang. Claims 5-8, 12-13, 16 are patentable over Kahn in view of Yang, at least by their dependency on claim 1 for the same reasons as outlined above.

Claims 26, 28-29

Kahn fails to teach or suggest a “means for exposing the liquid crystal display to the image wise pattern of light” as recited in claim 26. The Examiner asserted that this limitation is “clear from fig. 2.” However, Kahn clearly discloses that “[T]he optical energy is generated by a

lamp 42” (col. 5, lines 29-30) and that “[T]his flash tube 42 is used because it provides an intense, short, *spatially uniform optical beam*” (col. 6, lines 8-10, emphasis added) or pulse that is absorbed by the liquid crystal 32 such that when the liquid crystal cools subsequent to the pulse, uniform texture of scattering centers are formed (col. 5, lines 32-39). This preconditioning of the medium enhances the display by providing a dark uniform background. Indeed, Kahn discloses that “[T]his invention relates to improved methods and apparatus for creating *uniform* image backgrounds” (col. 1, lines 59-60, emphasis added). This process is independent of imaging and does not involve an “image wise *pattern* of light.” Thus, Kahn fails to teach or suggest a “means for exposing the liquid crystal display to the image wise pattern of light.”

Kahn fails to teach or suggest “a light absorbing layer for forming an image wise thermal pattern in response to an image wise pattern of light.” The Examiner asserted that this limitation is satisfied by “a light absorbing layer (35 and 37 in fig. 2; col. 6, lines 39-44) for forming an image wise thermal pattern (col. 5, lines 33-38) in response to an image wise pattern of light (42 in fig. 2; col. 5, lines 29-32).” As noted above, Kahn discloses that “[T]his invention relates to improved methods and apparatus for creating *uniform* image backgrounds” (col. 1, lines 59-60, emphasis added) and does not teach or suggest an “image wise pattern of light.” Creating a uniform background using a uniform optical pulse as shown in Figure 2 is not the same as the “forming an image wise thermal *pattern*” as recited in the present claims. Thus, Kahn fails to teach or suggest “a light absorbing layer for forming an image wise thermal pattern in response to an image wise pattern of light.”

Yang fails to cure the deficiencies of Kahn with respect to claim 26. Yang fails to teach or suggest a “means for exposing the liquid crystal display to the image wise pattern of light.” Yang further fails to teach or suggest ““a light absorbing layer for forming an image wise thermal pattern in response to an image wise pattern of light.”

Thus, Applicants respectfully submit that claim 26 is patentable over Kahn in view of Yang. Claims 28-29 are patentable over Kahn in view of Yang, at least by their dependency on claim 26 for the same reasons as outlined above.

Claims 2-4, 17-19 and 27

Claims 2-4, 17-19 and 27 are rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Kahn in view of Yang and further in view of U.S. Patent Application No. 2002/0005827 to Kobayashi ("Kobayashi"). Applicants respectfully submit that these claims are patentable over Kahn in view of Yang and Kobayashi.

Claims 2-4, 17-19

As discussed above, Kahn fails to teach or suggest "exposing the liquid crystal display to the image wise pattern of light" as recited in claim 1. Further as discussed above, Kahn fails to teach or suggest "a light absorbing layer for forming an image wise thermal pattern in response to an image wise pattern of light."

As discussed above, Yang fails to cure the deficiencies of Kahn with respect to claim 1. Kobayashi likewise fails to cure the deficiencies of Kahn with respect to claim 1.

Thus, Applicants respectfully submit that claims 2-4, 17-19 are patentable over Kahn in view of Yang and Kobayashi, at least by their dependency on claim 1.

Claim 27

As discussed above, Kahn fails to teach or suggest a "means for exposing the liquid crystal display to the image wise pattern of light" as recited in claim 26. Further as discussed above, Kahn fails to teach or suggest "a light absorbing layer for forming an image wise thermal pattern in response to an image wise pattern of light."

As discussed above, Yang fails to cure the deficiencies of Kahn with respect to claim 26. Kobayashi likewise fails to cure the deficiencies of Kahn with respect to claim 26.

Thus, Applicants respectfully submit that claims 27 is patentable over Kahn in view of Yang and Kobayashi, at least by its dependency on claim 26.

Claims 20-21

Claims 20-21 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kahn in view of Yang and further in view of U.S. Patent No. 5,357,356 to Konuma ("Konuma"). Applicants respectfully submits that these claims are patentable over Kahn in view of Yang and Konuma.

As discussed above, Kahn fails to teach or suggest “exposing the liquid crystal display to the image wise pattern of light” as recited in claim 1. Further as discussed above, Kahn fails to teach or suggest “a light absorbing layer for forming an image wise thermal pattern in response to an image wise pattern of light.”

As discussed above, Yang fails to cure the deficiencies of Kahn with respect to claim 1. Konuma likewise fails to cure the deficiencies of Kahn with respect to claim 1.

Thus, Applicants respectfully submit that claims 20-21 are patentable over Kahn in view of Yang and Konuma, at least by their dependency on claim 1.

Claims 22-25

Claims 22-25 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kahn in view of Yang and further in view of U.S. Patent Application No. 2003/0206147 to Mi et al. (“Mi”). Applicants respectfully submits that these claims are patentable over Kahn in view of Yang and Mi.

As discussed above, Kahn fails to teach or suggest “exposing the liquid crystal display to the image wise pattern of light” as recited in claim 1. Further as discussed above, Kahn fails to teach or suggest “a light absorbing layer for forming an image wise thermal pattern in response to an image wise pattern of light.”

As discussed above, Yang fails to cure the deficiencies of Kahn with respect to claim 1. Mi likewise fails to cure the deficiencies of Kahn with respect to claim 1.

Thus, Applicants respectfully submit that claims 22-25 are patentable over Kahn in view of Yang and Mi, at least by their dependency on claim 1.

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CONCLUSION

In view of the remarks submitted above, it is respectfully submitted that the present claims are in condition for immediate allowance. It is therefore respectfully requested that a Notice of Allowance be issued. The Examiner is encouraged to contact Applicants' undersigned attorney to resolve any remaining issues in order to expedite examination of the present invention.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,



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